## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF VIRGINIA ABINGDON

### UNITED STATES OF AMERICA

v. Case No. 1:21-cr-23

#### RALPH THOMAS REACH

Defendant.

## MOTION TO WITHDRAW AS COUNSEL

COMES NOW Dennis E. Jones, counsel for the Defendant, Ralph Thomas Reach, and pursuant to Local Rule 6(i) respectfully moves this Honorable Court for an order permitting him to withdraw as counsel in the above-captioned matter. In support of this motion, counsel says as follow:

- 1. Defendant engaged counsel to represent him in the defense of the allegations contained in the Indictment returned April 27, 2021 pursuant to the terms of a written retention agreement.
- 2. Defendant was arraigned on the charges set forth in the Indictment on April 29, 2021 and scheduled for jury trial January 10, 2022 through February 4, 2022.
- 3. Defendant has not complied with the terms and conditions of his retention agreement with counsel.

- 4. Defendant's failure to comply with the terms and conditions of his retention agreement affects counsels' ability to adequately represent Defendant in matters relating to trial strategy and adequate preparation for trial which directly impact the effective representation of counsel on behalf of Defendant.
- 5. Counsel has advised the Assistant United States Attorney of his intention to file the Motion to Withdraw and has been advised that the Government takes no position in the Motion.
- 6. Granting the Motion to Withdraw will not prejudice the Defendant or the Government in the prosecution of this case.
- 7. For these reasons, counsel respectfully moves this Honorable Court for leave to withdraw as counsel for Ralph Thomas Reach.

Respectfully Submitted,

/s/ Dennis E. Jones, Esq.

DENNIS E. JONES, ESQ.

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Counsel for the Defendant, Ralph Thomas Reach

# **CERTIFICATE**

I, Dennis E. Jones, Counsel for Defendant, Ralph Thomas Reach, do hereby certify that on this the 28<sup>th</sup> day of September 28, 2021, I electronically filed the forgoing Pleading with the Clerk of this Court using the CM/ECF system which will send notification of such filing to all Counsel of record and that a copy has been served on the Defendant via e-mail medmax1959@hotmail.com

/s/ Dennis E. Jones, Esq. DENNIS E. JONES, ESQ. Counsel for the Defendant